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Exhibit "4"

Form of Stipulation Relating to Order and Permanent Injunction ★ **APR 17 2017** ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

GOVERNMENT EMPLOYEES INSURANCE
COMPANY, et al.,

Docket No.:
1:16-CV-06981(ILG)(LB)

Plaintiffs,

-against-

JAMAICA AVENUE CHIROPRACTIC, P.C., et al.,

Defendants.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company and GEICO Casualty Company (collectively referred to as "Plaintiff") and counsel for Defendants Mark Heyligers, D.C., David Kreshover, D.C., and Jamaica Avenue Chiropractic, P.C. (collectively referred to as the "Chiropractic Defendants") as follows: (i) Chiropractic Defendants hereby appear in this action through its counsel, Douglas M. Nadjari Esq., Ruskin, Moscou, Faltischek, P.C., 1425 RXR Plaza, Uniondale, New York 11556, and (ii) Chiropractic Defendants consent to the jurisdiction of this Court and to the entry of the Order and Permanent Injunction in the form attached as Exhibit "3."

Dated: April 13, 2017

RIVKIN RADLER LLP

By: 

Michael A. Sirignano, Esq.

Frank P. Tiscione, Esq.

926 RXR Plaza

Uniondale, New York 11556-0926

Counsel for Plaintiffs, Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company and GEICO Casualty Company

RUSKIN MOSCOU FALTISCHEK, P.C.

By: 

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1425 RXR Plaza

Uniondale, New York 11556-1425

Counsel for Defendants

So ordered
D. H. Glavin
4/14/17